



Bayer Environmental Science

Mr. Dan Kenny
Registration Division (H7504C)
Office of Pesticide Programs
U.S. ENVIRONMENTAL PROTECTION AGENCY
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

Subject: New Submission - Imidacloprid CTG Insecticide

April 26, 2004

Dear Mr. Kenny:

Bayer Environmental Science

With this submission Bayer Advanced proposes the registration of
Imidacloprid CTG Insecticide.

95 Chestnut Ridge Road
Montvale, NJ 07645
Tel. (201) 307-9700
Fax (201) 307-3438

I would propose that this new product submission, fall within fee category
R31 and should require a fee of \$4000 for processing.

Sincerely,

Charles W. Boyd
Registrations Manager
charles.boyd@bayercropscience.com

Section II - Explanation

With this submission Bayer Advanced proposes the registration **Imidacloprid CTG Insecticide**. The proposed use of this product is for control of Termites in home lawns and near homes. The product can also be use around fence posts etc.

This product contains a single active ingredient, Imidacloprid at 0.37% by weight. The use pattern and directions for use proposed are similar to many other perimeter granule treatments.

The product composition is similar to Merit® 0.5 G Insecticide (EPA Reg. No. 432-1328) with the exception of the carrier. Both carriers are list [REDACTED] inerts.

Note: ICT Granules is synonymous with Imidacloprid CTG Insecticide.

Product Chemistry data is included and the toxicity data for an imidacloprid 0.5% granule has been cited in the enclosed data matrix.

To satisfy the requirements for registration of **Imidacloprid CTG Insecticide** the following materials are included with this application:

- 1). Confidential Statement of Formula
Basic Formula, CSF dated 11/18/03.
Alternate Formula, CSF dated 11/19/03.
- 2). Certification with Respect to Citation of Data with data matrix.
- 3). Five copies of the proposed labeling, draft number D – 9729 081502.
- 4). 3 copies each of the following studies:

Product Chemistry of Imidacloprid CTG Insecticide,
December 18, 2004; US EPA OPPTS Guideline No.s 830
series. H.L. Mitchell. Bayer Brochure No. 2308, 60p.

Performance Data: ICT Granules (Imidacloprid 0.37%) –
Termite Efficacy Summary, March 5, 2004; US EPA
OPPTS Guideline No. 810.3500. V. B. Steward. Bayer
Report Number G200782, 8p.

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